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6
7 IN THE UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF CALIFORNIA

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 QUINTIN JEUH CARLOS-BANUELOS and
HECTOR GOMEZ

13 Defendants.
14

CASE NO. 1:20-CR-00175-NODJ-BAM

STIPULATION TO CONTINUE CHANGE OF
PLEA HEARING AND ORDER THEREON

15
16 **STIPULATION**

17 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
18 through defendant's counsel of record, hereby stipulate as follows:

19 1. By previous order, this matter was set for a change of plea hearing on March 18, 2024, at
20 9:00 a.m. Per the Court's request, the parties now seek to continue the change of plea hearing to March
21 22, 2024, at 8:30 a.m. The proposed change of plea date represents the earliest date that all counsel are
22 available, taking into account counsels' schedules, defense counsels' commitments to other clients, and
the court's available dates for a change of plea hearing.

23 2. The parties agree and stipulate, and request that the Court find the following:

24 a) The discovery associated with this case includes case includes voluminous
25 investigative reports, wire interceptions recordings and electronic messages, precise location
26 information data, and cellular phone downloads, totaling thousands of pages of discovery and
27 several gigabytes of electronic data.
28

b) Defense counsel requests the additional time to prepare for the change of plea hearing, meet with his client, and review/negotiate the plea agreement.

c) Counsel for the defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Time has already been excluded beyond the proposed change of plea hearing date.

IT IS SO STIPULATED.

Dated: February 27, 2024

PHILLIP A. TALBERT
United States Attorney

By: /s/ JUSTIN J. GILIO
JUSTIN J. GILIO
Assistant United States Attorney

Dated: February 27, 2024

/s/ Victor Chavez
Attorney for Defendant
QUINTIN JEUH CARLOS-BANUELOS

Dated: February 27, 2024

/s/ Mark Coleman
Attorney for Defendant
HECTOR GOMEZ

ORDER

IT IS SO ORDERED that the change of plea hearing is continued from March 18, 2024, to **March 22, 2024, at 8:30 a.m. in Courtroom 5 before the District Court Judge**. Time was previously excluded through May 14, 2024.

IT IS SO ORDERED.

Dated: **March 7, 2024**

/s/ *Barbara A. McAuliffe*
UNITED STATES MAGISTRATE JUDGE